

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 21-3032

UNITED STATES OF AMERICA,

Appellee,

v.

THEODORE DOUGLAS,

Appellant.

**APPELLEE’S UNOPPOSED MOTION FOR EXTENSION OF
TIME WITHIN WHICH TO FILE APPELLEE’S BRIEF**

Pursuant to D.C. Cir. R. 27(h), appellee, the United States of America, respectfully moves this Court for a 15-day extension of time, to and including July 26, 2022, within which to file its brief in this case. Appellee’s brief is currently due on July 11, 2022. Because this extension will run into counsel for appellant’s previously scheduled leave, we are also requesting that the due date for appellant’s reply brief be set for September 6, 2022.

This is appellee’s second request for an extension of time in this case. We previously received a 45-day extension in this case, bringing the total extension to 60 days. As grounds for this motion, appellee states

that the undersigned Assistant United States Attorney, to whom this matter is now assigned, will be unable to complete the government's brief by the current due date because of the press of other appellate business (principally another brief in this Court that will be filed today) and the need to review appellant's claims and the appellate record. Appellant's 47-page brief raises three Fourth Amendment challenges, which each require separate research and analysis.

Appellee contacted counsel for appellant, Tony Axaam, Jr., Esq., who indicated that he does not oppose this request.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

CHRISELLEN R. KOLB
Assistant United States Attorney

/s/

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CERTIFICATE OF COMPLIANCE WITH RULE 27(d)

I HEREBY CERTIFY pursuant to Fed. R. App. P. 32(g) that this motion contains 217 words, and therefore complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A). This motion has been prepared in 14-point Century Schoolbook, a proportionally spaced typeface.

/s/

ERIC HANSFORD

Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused a copy of the foregoing motion to be served by electronic means, through the Court's CM/ECF system, upon counsel for appellant, Tony Axam, Jr., Esq., on this 30th day of June, 2022.

/s/

ERIC HANSFORD

Assistant United States Attorney